

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

Laura Van Heijningen and Tom Van
Heijningen

Plaintiffs,

v.

30 Watt Holdings, Inc. and Ryan Dolan,

Defendants.

Case No: 17-cv-00426-L.A.

MOTION TO EXTEND TIME TO FILE
DISPOSITIVE AND NON-DISPOSITIVE
MOTIONS

Plaintiffs hereby enter the following Motion to Extend Time to File Dispositive and Non-Dispositive Motions, pursuant to Rule 6 of the Federal Rules of Civil Procedure and offer the following support for this motion.

1. On January 4, 2018 this Court issued a Scheduling Order calling for all dispositive motions to be filed by August 1, 2018. (DOC. 17).
2. The Parties have engaged in reciprocal discovery. However, both Parties have outstanding discovery items to be produced. (Adams Affidavit at ¶ 2).
3. To date, the Parties have met and conferred and have produced some discovery items. (Adams Affidavit at ¶ 2).
4. However, a large file containing long-sought-after financial records was only produced by the defense on the afternoon of Thursday, July 26, 2018. (Adams Affidavit at ¶ 3).
5. Also on the afternoon of Thursday, July 26, 2018, Defendants produced Clover point-of-sale (POS) system access that allowed access to critical financial records in a usable format. (Adams Affidavit at ¶ 4).

6. Plaintiffs are committed to working collaboratively toward obtaining outstanding discovery materials through the meet and confer process. However, Plaintiffs should not be precluded from pursuing non-dispositive Motion(s) to Compel if the discovery process cannot be achieved voluntarily by the Parties. (Adams Affidavit at ¶ 6).
7. Further, as all discovery has not yet been produced or has just recently been produced, Plaintiffs should be afforded the opportunity to file dispositive motions based upon the contents of the outstanding discovery. (Adams Affidavit at ¶ 5).
8. In further support of this motion, Plaintiffs believe that after full production of sought discovery materials and review of the materials by a Certified Public Accountant, settlement negotiations will be more productive and should result in a conclusion of this matter prior to trial or the filing of dispositive motions. (Adams Affidavit at ¶ 5).
9. Plaintiffs have scheduled an appointment with a Certified Public Accountant to begin reviewing the recently produced financial records. (Adams Affidavit at ¶ 6).
10. Plaintiffs believe the aforementioned facts create good cause to extend the motion deadlines.

11. Therefore, Plaintiffs request a modest forty-five (45) day (September 15, 2018) extension to file both non-dispositive and dispositive motions in the instant case.

Respectfully Submitted, at Milwaukee, Wisconsin, this 31st day of July 2018:

ADAMS LAW GROUP, LLC
For the Defendant

By: /s/ _____
Daniel M. Adams
State Bar No. 1067564
1200 E. Capitol., Suite 360
Milwaukee, WI 53211
(T) 414-921-1945
(F) 414-921-1946
Dan@DefenseWisconsin.com